

ALBERT L. FARRAH, JR.

COUNSELOR AT LAW

One Washington Mall • Boston, MA 02108

(617) 742-7766 • Fax: (617) 742-2331

alf@afarrah.com

www.afarrah.com

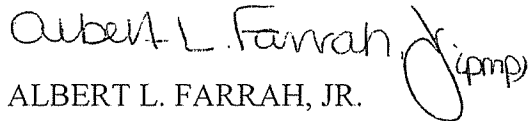
February 27, 2007

United States District Court
Civil Clerk's Office
One Courthouse Way
Boston, MA 02210

RE: Nancy Rosario, et al v. RARE Hospitality International, Inc. d/b/a Longhorn Steakhouse
United States District Court Docket #05-CV-10617MLW

I enclose for filing Plaintiff's First Supplement to Initial Disclosure Filed on September 30, 2005. Please contact me if you have any questions.

Sincerely,


ALBERT L. FARRAH, JR.

pmp

ELECTRONIC FILING ONLY

Encl.

cc: Nancy Santiago
Louis J. Farrah, II, Esq.
Michael Gillis, Esq. (E-mail and Regular Mail)

ALBERT L. FARRAH, JR.

COUNSELOR AT LAW

One Washington Mall • Boston, MA 02108

(617) 742-7766 • Fax: (617) 742-2331

alf@afarrah.com

www.afarrah.com

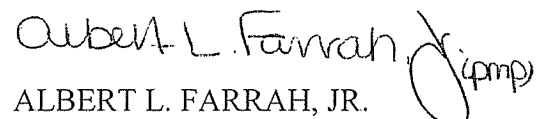
February 27, 2007

United States District Court
Civil Clerk's Office
One Courthouse Way
Boston, MA 02210

RE: Nancy Rosario, et al v. RARE Hospitality International, Inc. d/b/a Longhorn Steakhouse
United States District Court Docket #05-CV-10617MLW

I enclose for filing Plaintiff's First Supplement to Initial Disclosure Filed on September 30, 2005. Please contact me if you have any questions.

Sincerely,


ALBERT L. FARRAH, JR.
pmp

ELECTRONIC FILING ONLY

Encl.

cc: Nancy Santiago
Louis J. Farrah, II, Esq.
Michael Gillis, Esq. (E-mail and Regular Mail)

Santiago-RARE.ltr438

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

NANCY ROSARIO, INDIVIDUALLY, AS)	
SHE IS THE ADMINISTRATRIX OF THE)	
ESTATE OF AWILDA SANTIAGO, ESSEX)	
PROBATE COURT DOCKET #03P-2499AD1,)	
P/P/A VERONICA ROSARIO AND)	
CHRISTINA SANTIAGO, AND AS)	
SHE IS THE ADMINISTRATRIX OF THE)	
ESTATE OF JOSE SANTIAGO, BERLIN)	Civil Action #05-CV-10617MLW
(CONNECTICUT))	
PROBATE COURT, CASE #03-0713)	
<u>Plaintiff</u>)	
)	
v.)	
)	
RARE HOSPITALITY INTERNATIONAL, INC.)	
d/b/a LONGHORN STEAKHOUSE)	
<u>Defendant</u>)	

PLAINTIFF'S FIRST SUPPLEMENT TO INITIAL DISCLOSURE
FILED SEPTEMBER 30, 2005

Pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure, the plaintiff hereby supplements her initial disclosure filed with the court on September 30, 2005 by adding the following additional witnesses:

(a) **names, addresses and telephone numbers of each individual likely to have discoverable information relevant to disputed facts alleged with particularity in the pleadings, identifying the subjects of the information.**

Supplement to Category #7-Current or Former Employees of the Defendant

- a. Kristen O'Donnell-60 Phillips Passway, Fitchburg, MA
- b. Sharri Salmond-992 Riceville Road, Athol, MA
- c. Charles Bouillanine, 24 Scottsdale Drive, Hudson, N.H.

d. Charles Noonan, 103 Western Circle, Westfield, MA

e. Patricia Kriedler, 205 Central Ave, Fitchburg, MA

Supplement to Category #47-Various Teachers of Christina Santiago

a. Sharon Kronowski, 4th Grade Teacher, Lawrence Public Schools, 225 Essex Street, Lawrence, MA 01841; Telephone: (978) 975-5905.

Additional Witness

a. Jose Garcia, 108 Water Street, Lawrence, MA 01841; Telephone: (978) 406-2777 is likely to have discoverable information about the effects of the injuries suffered by Christina Santiago, Veronica Rosario and Nancy Rosario as a result of the accident described in the Complaint.

b. Record keepers at Advance Personnel Staffing, 518 Elm Street, Reading, PA 19603; Remcon Plastics Inc. 208 Chestnut Street, Reading, PA 19602; and Temp Star Staffing LTD; 4411 5th Street Highway, Reading, PA 19603 are likely to have discoverable information about the employment history and earning capacity of Jose Santiago from 2000 to 2003.

c. Aileen Lopez of Reading, Pennsylvania (610-468-6216) is likely to have discoverable information about the work history and living arrangements of Jose Santiago and the loss of the fair monetary value of Jose Santiago to his survivors, especially Natasha Santiago, including the loss of reasonably expected net income, services, protection, care, assistance, society, companionship, comfort, guidance, counsel and advice of Jose Santiago to Natasha Santiago.

d. Sgt. Michael Holleran, MSP Crime Scene Services Section, Danvers, MA (508) 358-3200, a State Police photographer, is likely to have discoverable information about the accident scene.

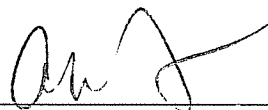
e. Trooper Carrie Fisher, MSP Crime Scene Services Section, Danvers, MA (508) 358-3200, a State Police photographer, is likely to have discoverable information about the accident scene.

f. Marielena P. Tecce, MA, South Bay Mental Health, 15 Union Street, Lawrence, MA 01841; Telephone: (617) 688-4830, is likely to have discoverable information about Veronica Rosario and Christina Santiago's damages.

g. Keeper of the Records, South Bay Mental Health, 15 Union Street, Lawrence, MA 01841; Telephone: (617) 688-4830, is likely to have discoverable information about Veronica Rosario and Christina Santiago's damages.

h. Keeper of the Records, Enterprise Rent-A-Car of Boston, Inc., is likely to have discoverable information concerning the accident.

Plaintiffs
By their attorney:



ALBERT L. FARRAH, JR.
One Washington Mall
Boston, MA 02108
(617)742-7766
B.B.O. #159340

Date: February 27, 2007

CERTIFICATE OF SERVICE

SUFFOLK, SS

February 27, 2007

A copy of the Plaintiff's First Supplement to Initial Disclosure Filed on September 30, 2005 was today mailed to Michael Gillis, Esq., Gillis & Bikofsky, P.C., 1150 Walnut Street, Newton Highlands, MA 02461.



Albert L. Farrah, Jr., Esq.